

AO 91 (Rev. 11/11) Criminal Complaint

## UNITED STATES DISTRICT COURT

for the

Western District of Texas

United States of America

v.

Walter Crosley

Case No. 5:17-MJ-1060

*Defendant(s)*

**FILED**  
 SEP - 7 2017  
 CLERK, U.S. DISTRICT COURT  
 WESTERN DISTRICT OF TEXAS  
 BY MAN DEPUTY

## CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of June 7, 2017 in the county of Kerr in the  
Western District of Texas, the defendant(s) violated:

*Code Section*

18 § 844(e)

*Offense Description*

Willfully making a threat to kill any individual or destroy any building by  
 means of an explosive.

This criminal complaint is based on these facts:

See Attached Affidavit

☒ Continued on the attached sheet.

Gregory P. Pratt  
*Complainant's signature*

Greg Pratt, S/A - FBI

*Printed name and title*

Sworn to before me and signed in my presence.

Date:

9/6/17*Judge's signature*

City and state:

San Antonio, TX

Elizabeth S. Chestney, US Magistrate Judge

*Printed name and title*

Max Penalties: 10 years imprisonment; \$250,000 fine; 3 years supervised release and \$100 special assessment.

**AFFIDAVIT**

I, GREGORY P. PRATT (AFFIANT), Special Agent with the Federal Bureau of Investigation (FBI), being duly sworn, state as follows:

1. I am a Special Agent with the FBI, duly appointed according to law and acting as such, and have been employed by the FBI since February 1998. As an FBI Special Agent, I am responsible for the enforcement of various federal laws, including those relating to 18 U.S. Code § 844(e). I am currently assigned to the San Antonio Division, Domestic Terrorism Squad of the FBI.
2. This affidavit is submitted in support of a complaint and an arrest warrant for subject WALTER STEVEN CROSLEY (CROSLEY). Your affiant asserts there is probable cause to believe that CROSLEY used an instrument of interstate commerce, the Internet, to willfully make a threat to kill an individual and to destroy a building by means of an explosive, in violation of Title 18 U.S. Code § 844(e). CROSLEY engaged in this conduct within the San Antonio Division of the Western District of Texas.
3. The information contained in this affidavit is a compilation of information developed during an investigation conducted by your Affiant as well as officers and Agents with the United States Department of Veteran Affairs.
4. CROSLEY served in the United States Army until he was honorably discharged on October 30, 2008. His job in the Army was that of Motor Transport Operator and he achieved the rank of Specialist/E-4. While in the Army, CROSLEY served in Iraq in support of Operation Iraqi Freedom from January 5, 2005 through December 18, 2006. CROSLEY was permanently retired and received a 100% service-related disability on September 26, 2013.
5. CROSLEY receives periodic treatment at the Kerrville VA Medical Center, 3600 Memorial Blvd, Kerrville, TX 78028 (hereafter referred to as the VA). On June 7, 2017, while visiting the VA, CROSLEY allegedly made a comment to a VA nurse that "I may be the next guy that takes y'all out." The nurse took the comment as a threat and the matter was referred to the United States Department of Veteran Affairs, Office of Inspector General (VAOIG).
6. On July 6, 2017, CROSLEY was interviewed by VAOIG Special Agents Jeffrey Breen and Brian Cummings. CROSLEY stated substantially as follows: He lives in Lakehills, TX. He

is an Army veteran and has a 100% service connected (50% for PTSD) disability. He served in the Army for 13 years, and in 2005, suffered a Traumatic Brain Injury and several other bodily injuries in an IED explosion. When asked if he ever said to a nurse "I may be the next guy that takes y 'all out," CROSLEY stated that he did not. CROSLEY then explained that he never threatened anybody at the VA and that he was merely detailing a scenario to the VA staff in which a veteran might become agitated and come to the VA looking to cause harm. When asked if he has ever felt like hurting himself or anybody at the VA, CROSLEY stated that he did not want to hurt anybody. CROSLEY advised that he has a shotgun at his house. His son, who lives separately from him, has CROSLEY's assault rifle and combat shotgun. The Kerr Co. Sheriff's Office has CROSLEY's pistol, which was confiscated from CROSLEY after he attempted a citizen's arrest of an individual. CROSLEY stated that, on occasion, he accidentally brings a knife with him to the VA. CROSLEY stated that, overall, he is happy with the care that he receives from the VA. Per CROSLEY, the only stressor in his life is the cover up by Halliburton regarding the water that it poisoned in Iraq and the many veterans who contracted "Q-Fever" by drinking the infected water. CROSLEY stated that several veterans have died due to "Q-Fever." When CROSLEY was asked if he was receiving psychiatric care from the VA, he stated that he was not, but that he would definitely see any psychiatrist who was willing to discuss Halliburton and Q-Fever with him.

7. CROSLEY periodically uploads videos to YouTube under the name of "Retired Warrior." On August 28, 2017, CROSLEY uploaded a video entitled "This Is What Excitotoxicity or Excitotoxicity Looks Like!" The video lasts seven minutes and 39 seconds and features CROSLEY talking to the camera. In the video, CROSLEY states "I threatened to blow up the VA if they didn't put me in a study group called a...I mean I went off, I went fucking off. I was telling them. There's no way I'm sick, I've got fucking pustules under my armpits. I said I wanted to be put in a war related illness and injury study center, or I'm going to start blowing up VA. And I'm going to start killing the doctors that are lying about the diseases we came back with ... the Halliburton. The fact that they refuse to cover the KBR Halliburton water purifications."

8. Later in the video, CROSLEY states "And I'm tired of it. I'm gonna die. And, if I'm going to die anyway, and I think this is a war, and 22 soldiers dying a day seems like a war to me... and police officers killing soldiers who act out, that's warlike to me. It's war. We're in a

war, my soldiers are dying, I'm dying and I see this as a fucking war. I don't have any information to put out, other than this: I'm expecting the Sheriff's department. My wife is so shocked, she heard everything. She heard me say I was gonna blow shit up if I did not get into this war related illness and injury study center uh immediately to figure out what the fuck is wrong with me. I want in a PTSD study group, too. Whether...I want...I had a traumatic brain injury. I want to study whether it's acquired traumatic brain injury or it came from an IED blast."

9. Later in the video, CROSLLEY states "that's a lie. That's a fuckin lie. That's why I told him I would blow the fuck up the VA or whatever, I was not gonna be the next soldier that just happened over here in Amarillo. He pulled up into the VA, they weren't takin care of him. He pulled into the parking lot and fuckin killed himself. I'm not killing myself. I'm not going down alone. I'm gonna fuckin kill others. I've got a list. Like Arya Stark I'm gonna fuckin make a list of people I'm gonna take out before I take myself out. How's that? This is serious, this is so serious. Fix me and my soldiers or I'm gonna fix you. I don't care, come over and do a welfare check on me. Yes, I'm sick. I have excitotoxicity. Excito-neurotoxicity, it's like bees buzzing in your brain. You're so sick, you're so tired. I can see how these soldiers just commit suicide or reach out and just kill others. This other soldier, that uh Colton Puckett, threw his wife and a baby on a floor, and had a stand-off with a fuckin...a shotgun with the cops. That's me. I'm fixing to be the next Colton Puckett, I'm fixing to be the next Esteban Santiago, the next Justin Walters, the next uh John Russell. Uh Sgt. John Russell, the Camp Liberty killer. Or John Neumann, Jr. who walked into a workplace and killed all of his...uh, all of the employees in there. This all just recently happened. I'm tracking every soldier. Robert Rojas running over people in NY, jumping out of his car, screaming "Kill me." That was a veteran. Why are these veterans doing this? I'm gonna continue talking about this. My wife says "You sound like a broken record." I said "Well, guess what, I'm a broken soldier." I should keep repeating myself I guess, because I'm broken. I'm tired of seeing my soldiers die. I'm dying, I'm dying, I'm not getting any better. My wife is in worse shape than me. She goes to the hospital about every two weeks, every month with a high white blood cell count, IBS, travelers' diarrhea, all this other stuff. She's on more antibiotics than me. When she dies, I'm going off the deep end. I'm...all the things you trained us, linear charges, how to blow up infrastructure. Destroy, destroy, destroy. I'm going to go on a destructive path. And you can write about it and put it in the history books. This is why I'm going to do it, because you won't fuckin save soldiers.

10. With regard to individuals CROSLEY references in the video, your affiant asserts that Colton Puckett was a former United States Marine suffering from PTSD who was killed by police in August 2017, after charging at them with a shotgun. Esteban Santiago was an Iraq war veteran charged with killing five people and injuring six others in a mass shooting at Fort Lauderdale's international airport in January 2017. Justin Walters was a U.S. Army soldier suffering from PTSD who was charged with first and second degree murder in connection with the July 9, 2017 shooting deaths of his wife, Nichole Walters and a state trooper. On May 11, 2009, five United States military personnel were fatally shot at a military counseling clinic at Camp Liberty, Iraq by Army Sergeant John M. Russell. John Neumann was a U.S. Army veteran who killed five persons in a workplace violence episode in Orlando in June 2017. An 18-year-old woman was killed and 22 other people were injured when a car driven by Navy veteran Richard Rojas plowed through a crowd at New York's Times Square in May 2017.

11. On December 29, 2012, an Emergency Detention was done on CROSLEY by the Bandera City Marshal's Office after CROSLEY fired shots into the air with a 9mm handgun. CROSLEY claimed that there had been two intruders in his back yard, but there was no evidence or witness statements to corroborate CROSLEY's assertions.

12. On April 6, 2016, CROSLEY was arrested by the Kerr County Sheriff's Office for Aggravated Assault with a Deadly Weapon, a second degree felony. He was indicted on this charge by the 216<sup>th</sup> District Court. The case was transferred to the 198<sup>th</sup> District Court on May 24, 2016. In June 2017, a professional was appointed to review CROSLEY for competency in connection with this charge. This report has not yet been received by the 198<sup>th</sup> District Attorney's Office. I have read the police reports in that case, and CROSLEY is charged with assaulting an individual by pointing a 9mm pistol at him and forcing him out of a vehicle and onto his knees.

13. Without specifying the time period, Bandera County Sheriff's Officers informed me that they have had a total of 57 contacts with CROSLEY. They advised me that they fear that he may react violently when they approach his residence.

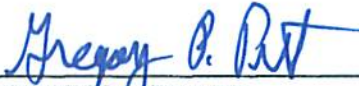
14. Because of the nature of the threats that CROSLEY has made in this case, because of his pending charges for aggravated assault with a deadly weapon, and because the Bandera County Sheriff's Office have had 57 contacts with CROSLEY, and their expression of fear of violence, your Affiant asks this Court for permission to arrest CROSLEY without knocking and



announcing the presence of law enforcement and for permission to effect this arrest in the early morning hours of Thursday, September 7, 2017, or any other time deemed appropriate to reduce the danger of harm to law enforcement agents and officers, as well as CROSLEY and his family, and other civilians.

15. CROSLEY used the Internet, an instrument of interstate and foreign commerce, to post his threats on YouTube. CROSLEY willfully threatened to kill individuals working for Veterans Affairs and to unlawfully damage and destroy buildings by means of explosives.

16. Based on the foregoing and on your affiant's training and experience, your affiant assert that there is probable cause to believe that WALTER STEVEN CROSLEY has violated the provisions of Title 18 U.S. Code § 844(e) and is a danger to the community.

  
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GREGORY P. PRATT  
Special Agent  
Federal Bureau of Investigation

Sworn to and subscribed before me on September 6, 2017, and finding probable cause supports the Defendant's arrest.

  
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ELIZABETH S. CHESTNEY  
UNITED STATES MAGISTRATE JUDGE